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JUN 15 2021

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WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA, LOUISIANA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA \* CRIMINAL NO. 21-00075  
\*  
VERSUS \* JUDGE DRELL  
\*  
JOYCE GREENE PERRY \* MAGISTRATE JUDGE PEREZ-MONTES

PLEA AGREEMENT

A. INTRODUCTION

1. This document contains the complete plea agreement between the government and **Joyce Greene Perry**, the defendant. No other agreement, understanding, promise, or condition exists, nor will any such agreement, understanding, promise or condition exist unless it is committed to writing in an amendment attached to this document and signed by the defendant, an attorney for the defendant, and an attorney for the government. The terms of this plea agreement are only binding on the defendant and the government if the Court accepts the defendant's guilty plea.

B. THE DEFENDANT'S OBLIGATIONS

1. **Joyce Greene Perry** shall waive Grand Jury presentment of the charge(s) filed in this case and appear in open court and plead guilty to the one count bill of information pending in this case.

C. THE GOVERNMENT'S OBLIGATIONS

1. If the defendant completely fulfills all obligations and agreements under

this plea agreement, the government agrees it will not prosecute the defendant for any other offense known to the United States Attorney's Office, based on the investigation which forms the basis of the bill of information.

2. The government will and hereby moves pursuant to U.S.S.G. § 3E1.1(b) for the defendant to receive a one-point reduction in offense level should that offense level be 16 or greater, as the defendant has assisted authorities in the investigation or prosecution of her own misconduct by timely notifying authorities of her intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate resources efficiently.

D. SENTENCING

**Joyce Greene Perry** understands and agrees that:

1. The maximum punishment on count one is a term of imprisonment of not more than ten (10) years (pursuant to 18 U.S.C. § 641) and a fine of not more than \$250,000.00 (pursuant to 18 U.S.C. § 3571), or both;

2. The defendant shall be required to pay a special assessment of \$100 at the time of the guilty plea by means of a cashier's check, official bank check, or money order payable to "Clerk, U.S. District Court";

3. The defendant may receive a term of supervised release of not more than three years in addition to any term of imprisonment imposed by the Court;

4. A violation of any condition of supervised release at any time during the period of supervised release may result in the defendant being incarcerated over and above any period of imprisonment initially ordered by the Court;

5. The period of incarceration for a violation of a condition of supervised release could be as much as the full term of supervised release initially ordered by the Court, regardless of the amount of time of the supervised release the defendant has successfully completed;

6. In addition to the penalties set forth in the preceding paragraphs, the Court may order the defendant to make restitution to the victim in this case, the defendant agrees that restitution in this case is not limited to the amounts or victims referred to in the specific charge to which the defendant has pleaded guilty, and will be determined by the Court after a complete review of the evidence developed in the investigation of this case by the government and further investigation by the United States Probation Office as contained in the Presentence Report;

7. Any fine and/or restitution imposed as part of the defendant's sentence will be made due and payable immediately, and any federal income tax refund received by the defendant from the Internal Revenue Service while there is an outstanding fine and/or restitution shall be applied toward the fine and/or restitution award;

8. The defendant expressly authorizes the U.S. Attorney's Office to immediately obtain a credit report on her to be used in consideration of her ability to pay restitution or fine that may be imposed by the Court;

9. As part of the presentence investigation, the government will make available to the Court all evidence developed in the investigation of this case;

10. This case is governed by the Sentencing Reform Act as modified by

United States v. Booker, 543 U.S. 220 (2005), and the defendant has discussed the Sentencing Guidelines and its applicability with her counsel and understands and acknowledges that a final determination of the applicable guidelines range cannot be made until the completion of the presentence investigation;

11. The sentencing judge alone will decide what sentence to impose; and

12. The failure of the Court to adhere to a sentencing recommendation tendered by counsel shall not be a basis for setting aside the guilty plea which is the subject of this agreement.

**E. ENTIRETY OF AGREEMENT**

1. This plea agreement consists of this document and any addendum required by Standing Order 1.86. The defendant, the defendant's attorney, and the government acknowledge that this plea agreement is a complete statement of the parties' plea agreement in this case. It supersedes all other plea agreements and may not be modified unless the modification is in writing and signed by all parties. No other promises have been made or implied.

**F. SIGNATURES OF ATTORNEY FOR THE DEFENDANT, THE DEFENDANT, AND THE ATTORNEY FOR THE GOVERNMENT**

I have read this plea agreement and have discussed it fully with my client, **Joyce Greene Perry**. I concur in **Joyce Greene Perry** pleading guilty as set forth in this plea agreement.

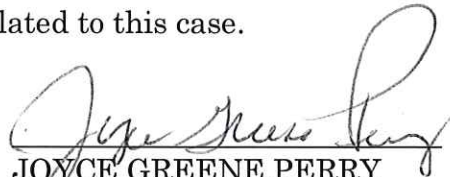
Dated: 5/13/2021

  
\_\_\_\_\_  
ASHLEY MARTIN  
Attorney for Defendant

I have read this plea agreement and have discussed it with my attorney. I fully understand the plea agreement and accept and agree to it without reservation. I do this voluntarily and of my own free will. No threats have been made to me, nor am I under the influence of anything that could impede my ability to fully understand this plea agreement.

I am satisfied with the legal services provided by my attorney in connection with this plea agreement and the matters related to this case.

Dated: 5/13/2021

  
JOYCE GREENE PERRY  
Defendant

I accept and agree to this plea agreement on behalf of the United States of America.

Dated: 5/13/21

  
MARY J. MUDRICK  
Assistant United States Attorney